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U.S. DISTRICT COURT E.D.N.Y.

GMP:BGK
F. #2016R00667

★ JAN 20 2017 ★
BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

NESTOR CHUA,

INFORMATION

Cr. No. 17-165BW
(T. 31, U.S.C., §§ 5313(a), 5324(a)(1) and
5324(d)(2); T. 18, U.S.C., §§ 3551 et seq.)

Defendant.

-----X

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

At all times relevant to this Information, the currency reporting requirements provided as follows:

Structuring and Currency Reporting Requirements

1. Transactions in currency were defined as transactions involving the physical transfer of money, as defined in Title 31, Code of Federal Regulations, Section 1010.100(bbb).
2. Domestic financial institutions were required to file a Currency Transaction Report (hereinafter referred to as a "CTR") with the Financial Crimes Enforcement Network ("FinCEN") for each transaction in currency, such as a deposit, withdrawal, exchange of currency or other payment or transfer by, through or to a financial

institution, in excess of \$10,000, as required by Title 31, United States Code, Section 5313 and Title 31, Code of Federal Regulations, Section 1010.311.

3. CTRs were filed on forms that required, among other things, disclosure of the identity of the individual who conducted the transaction and the individual or organization for whom the transaction was completed.

4. CTRs were required to be filed to assist the United States in criminal, tax and regulatory investigations and proceedings, as stated in Title 31, United States Code, Section 5311.

5. JPMorgan Chase Bank was a domestic financial institution, as defined in Title 31, United States Code, Section 5312.

CAUSING THE FAILURE TO FILE A CTR

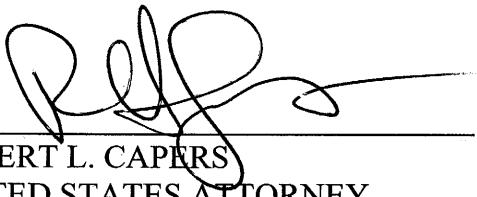
6. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

7. In or about and between August 2013 and September 2015, both dates being approximate and inclusive, within the Eastern District of New York, the defendant NESTER CHUA, together with others, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, did knowingly and willfully cause and attempt to cause a domestic financial institution, to wit: JPMorgan Chase Bank, to fail to file one or more reports required by Title 31, United

States Code, Section 5313(a) and the regulations prescribed thereunder, as part of a pattern of illegal activity involving more than \$100,000 in a twelve-month period.

(Title 31, United States Code, Sections 5313(a), 5324(a)(1) and 5324(d)(2);

Title 18, United States Code, Sections 3551 et seq.)



ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #20_R
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

NESTOR CHUA,

Defendant.

INFORMATION

(T. 31, U.S.C., §§ 5313(a), 5324(a)(1) and 5324(d)(2); T. 18, U.S.C.,
§§ 3551 et seq.)

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Brendan G. King, Assistant U.S. Attorney (718) 254-6006